

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ANDRE ANDERSON,

Plaintiff,

Case No. 21 Civ. 03569 (LAK)

- against -

**NOTICE OF MOTION**

SARENA TOWNSEND, Individually,  
RUBEN BENITEZ, Individually, DEION ISLAR,  
Individually, CHRISTOPHER DIXON, Individually,  
and NEW YORK CITY, New York,

Defendants.  
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**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law in Support of Plaintiff's Motion for Leave to File an Amended Summons and Complaint, the Declaration of Amy L. Bellantoni with annexed exhibits, and all pleadings and prior proceedings herein, Plaintiff will move pursuant to Rule 15(a) at the Daniel Patrick Moynihan United States Courthouse at 500 Pearl Street, New York, New York 10007 on a date and time to be determined by the Court, for an Order granting Plaintiff's Motion for Leave to File an Amended Summons and Complaint; and for such other, further, and different relief as to this Court may seem just, proper, and equitable.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Local Civil Rules 6.3 and 6.1(b), Defendants' opposition papers, if any, are to be served by February 9, 2022 and Plaintiffs' reply

papers, if any, are to be served by February 11, 2022.

Dated: Scarsdale, New York  
February 2, 2022

Respectfully Submitted,

THE BELLANTONI LAW FIRM, PLLC  
*Attorneys for Plaintiff*

By: \_\_\_\_\_/s/\_\_\_\_\_  
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cc: **Via ECF**  
Kami Barker  
New York Law Department  
Attorneys for Defendants